

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
(APWU/USPS-T1-18 THROUGH 20)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the American Postal Workers Union dated January 17, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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January 24, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T1-18 Please explain how the proposed changes in service standards are designed to “enhance the value of postal services to both senders and receivers” as required by 39 U.S.C. § 3691(b)(1)(A).

RESPONSE

Please see the institutional response to APWU/USPS-T1-3.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T1-19 Does the Postal Service intend to implement the Service Standard changes which are the subject of the Federal Register Notice published December 15, 2011 at 76 *Federal Register* 77942, apart from Network Rationalization and the mail processing changes proposed in this docket?

RESPONSE

The Federal Register Notice published on December 15, 2011 contains proposed service standard regulation changes. The rulemaking process will resolve the content of any service standard regulation changes that are ultimately implemented. Those service standard changes and the service changes (and underlying operational changes) discussed in this docket are inter-related and would be implemented accordingly.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T1-20 Will the Postal Service implement the Network Rationalize Plan on May 15, 2012, before receiving the benefit of the Commission's advisory opinion in this docket?

RESPONSE

The Postal Service has made well known its significant financial challenges and its plan to implement network changes. The Postal Service has asked the Commission to revise the procedural schedule so that its advisory opinion is issued in mid-April.